

DOCKET FILE COPY ORIGINAL

FOO MAIL ROOM

APR - 8 1999

RECEIVED

April 7, 1999

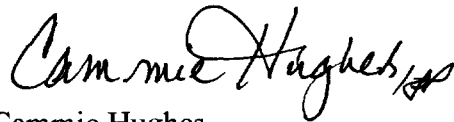
Ms. Magalie Roman Salas
Secretary
Federal Communication Commission
TW-A325
445 12th Street SW
Washington, D.C. 20554

RE: CC Docket No. 95-116
CCB/CPD No. 99-9

Dear Ms. Salas:

Enclosed herewith for filing with the Commission are an original plus four copies of the comments of the Texas Statewide Telephone Cooperative, Inc. and the Oklahoma Rural Telephone Coalition in the Matter of Joint Petition of the National Exchange Carrier Association, Inc., National Rural Telecom Association, National Telephone Cooperative Association, Organization for the Promotion and Advancement of Small Telecommunications Companies, and United States Telephone Association for Expedited Interim Waiver of Section 52.33(a) of the Commission's Rules.

Sincerely,



Cammie Hughes
Authorized Representative

cc: Chief, Competitive Pricing Division
Common Carrier Bureau

No. of Copies rec'd 0 + 4
List ABCDE

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20054

320 MAIL ROOM

APR - 8 1999

RECEIVED

In the Matter of)	
)	
Joint Petition of the National Exchange)	
Carrier Association, Inc. (NECA), National)	
Rural Telecom Association (NRTA),)	CC Docket No. 95-116
National Telephone Cooperative)	
Association (NTCA), Organization)	
for the Promotion and Advancement)	CCB/CPD No. 99-9
of Small Telecommunications Companies)	
(OPASTCO), and United States Telephone)	
Association (USTA) for Expedited Interim)	
Waiver of Section 52.33(a) of the)	
Commission's Rules)	

JOINT COMMENTS OF
TEXAS STATEWIDE TELEPHONE COOPERATIVE, INC.
And
OKLAHOMA RURAL TELEPHONE COALITION

Texas Statewide Telephone Cooperative, Inc. (TSTCI) and Oklahoma Rural Telephone Coalition (ORTC) ¹ file these comments in favor of the waiver request filed by the National Exchange Carrier Association, Inc. (NECA), National Rural Telecom Association (NRTA), National Telephone Cooperative Association (NTCA), Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO), and United States Telephone Association (USTA) (the Telephone Associations).

TSTCI and ORTC concur with the issues raised by the Telephone Associations and reiterate the necessity for a cost recovery mechanism for independent telephone companies that will be subject to LNP expenses.² TSTCI and ORTC member companies have already received FCC form 487, the LNP Worksheet that will determine the

¹ Attachment I contains membership lists of TSTCI and ORTC.

² See CC Docket No. 95-116, Joint Petition of ORTC and TSTCI for Clarification and Reconsideration (filed July 29, 1998).

members' financial contribution towards the regional database cost support and realize that N-1 query charges are following closely.

TSTCI and ORTC further add that potentially all end-users, whether served by an LNP-capable switch or not, will benefit from LNP when placing calls to ported numbers and as result, believe that it is equitable to allow independent companies to recover costs related to LNP. TSTCI and ORTC respectfully request that the Commission grant the Telephone Associations' waiver petition.

April 7, 1999

Respectfully submitted,

Texas Statewide Telephone Cooperative, Inc.

By: 

Don Richards, Attorney

McWhorter, Cobb & Johnson, L.L.P.
1722 Broadway
Lubbock, Texas 79401

Oklahoma Rural Telephone Coalition

By: 

Ron Comingdeer, Attorney

Comingdeer & Lee
6011 North Robinson
Oklahoma City, Oklahoma 73118

TEXAS STATEWIDE TELEPHONE COOPERATIVE, INC.

Brazos Telecommunications, Inc.
Brazos Telephone Coop., Inc.
Cameron Telephone Company
Cap Rock Telephone Coop., Inc.
Central Texas Telephone Coop., Inc.
Coleman County Telephone Coop., Inc.
Colorado Valley Telephone Coop., Inc.
Comanche County Telephone Company, Inc.
Community Telephone Company, Inc.
Cumby Telephone Coop., Inc.
Dell Telephone Coop., Inc.
E.N.M.R. Telephone Coop., Inc.
Eastex Telephone Coop., Inc.
Electra Telephone Company
Etex Telephone Coop., Inc.
Five Area Telephone Coop., Inc.
Ganado Telephone Company, Inc.
La Ward Telephone Exchange, Inc.
Lake Livingston Telephone Company
Lipan Telephone Company
Livingston Telephone Company
Mid-Plains Rural Telephone Coop., Inc.
Muenster Telephone Corp. of Texas
North Texas Telephone Company
Panhandle Telephone Coop., Inc.
Peoples Telephone Coop., Inc.
Riviera Telephone Company, Inc.
Santa Rosa Telephone Coop., Inc.
South Plains Telephone Coop., Inc.
Tatum Telephone Company
Taylor Telephone Coop., Inc.
Valley Telephone Coop., Inc.
Wes-Tex Telephone Coop., Inc.
West Plains Telecommunications, Inc.
West Texas Rural Tel. Coop., Inc.
XIT Rural Telephone Coop., Inc.

ORTC MEMBER COMPANIES

Atlas Telephone Company
Beggs Telephone Company
Bixby Telephone Company, Inc.
Canadian Valley Telephone Company
Carnegie Telephone Company
Central Oklahoma Telephone Company
Cherokee Telephone Company
Chickasaw Telephone Company
Chouteau Telephone Company
Cimarron Telephone Company
Cross Telephone Company
Dobson Telephone Company, Inc.
EagleNet, Inc.
Grand Telephone Company
Hinton Telephone Company
KanOkla Telephone Association, Inc.
Lavaca Telephone Company d/b/a Pinnacle Communications
McLoud Telephone Company
Medicine Park Telephone Company
Mid America Telephone Company
Oklahoma Communications Systems, Inc.
Oklahoma Telephone & Telegraph, Inc.
Oklahoma Western Telephone Company
Panhandle Telephone Cooperative, Inc.
Pine Telephone Company
Pioneer Telephone Cooperative, Inc.
Pottawatomie Telephone Company
Salina-Spavinaw Telephone Company
Santa Rosa Telephone Cooperative, Inc.
Shidler Telephone Company
South Central Telephone Association, Inc.
Southwest Oklahoma Telephone Company
Terral Telephone Company
Totah Telephone Company, Inc.
Valliant Telephone Company
Wyandotte Telephone Company
